

EXHIBIT 1

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	THIRTEENTH JUDICIAL CIRCUIT
COUNTY OF GREENVILLE)	
)	Civil Action Number 2020-CP-23-_____
)	
Trinity Electric and Controls,)	
)	
Plaintiff,)	SUMMONS
)	
v.)	(Jury Trial Demanded)
)	
Fairway Ford, Inc.)	
)	
Defendant.)	
)	
_____)	

TO THE DEFENDANTS ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against for the relief demanded in the complaint.

s/V. Elizabeth Wright
 SC Bar No. 76029
 V. Elizabeth Wright Law Firm, LLC
 217 E. Park Avenue
 Greenville, SC 29601
 (864) 326-5281
 bethwrightattorney@gmail.com

Greenville, South Carolina
 July 27, 2020

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	THIRTEENTH JUDICIAL CIRCUIT
COUNTY OF GREENVILLE)	
)	Civil Action Number 2020-CP-23-_____
)	
Trinity Electric and Controls,)	
)	
Plaintiff,)	COMPLAINT
)	
v.)	(Jury Trial Demanded)
)	
Fairway Ford, Inc.)	
)	
Defendant.)	
)	
_____)	

Plaintiff, Trinity Electric and Controls, Inc. (“Trinity”), complaining of Defendant Fairway Ford, Inc. (“Fairway”) would respectfully allege and show to the Court as follows:

Parties and Jurisdiction

1. Trinity is a business located in the State of North Carolina and, at all times mentioned herein, was transacting business in Greenville County, South Carolina.
2. Defendant Fairway, upon information and belief, is a South Carolina corporation with its principal place of business being located at 2323 Laurens Road, Greenville, SC 29607.
3. The subject contract of this action was performed in Greenville, South Carolina.
4. Jurisdiction is proper in this Court.
5. Venue is proper in this Court pursuant to S.C. Code Ann. § 15-7-30(E)(1) and (2).

Statement of Facts

6. On or about March 14, 2018, Fairway took an order from Trinity for a F-250 4x4 Crew Cab pickup truck with the MSRP of \$51,365.00. See Ex. A – preview order.

7. On or about June 6, 2018, Fairway Ford entered into a retail buyers order with Trinity Electric and Controls, Inc. for a 2018 Ford F250 Lariat pick-up, VIN 1FT7W2861JEC52290, mileage 25. See Ex. B, Retail Buyers Order. Trinity paid a total of \$64,112.06 for the truck, including \$20.00 for license and title.
8. Trinity traded in a 2017 Ford F150 XLT pick-up and received a trade allowance of \$27,500.00. See Ex. B, Retail Buyers Order.
9. The Retail Buyers Order indicates that Fairway Ford had the information concerning Trinity's insurance agent Matt Gambrell of State Farm located in Hendersonville, North Carolina and that it had spoken to Mr. Gambrell. See Ex. B, Retail Buyers Order.
10. On or about June 15, 2018, a tax and fee summary issued by the State of North Carolina for account number 1078101, Trinity Electric and Controls Inc., VIN 1FT7W2B61JEC52290, indicates that the fees and taxes were paid for this vehicle on June 15, 2018 in the amount of \$966.20. See Ex. C tax and fee summary.
11. On or about June 21, 2018, Al Cole, Commercial/Fleet manager for Fairway Ford informed John Kennedy that Fairway Ford was required to do the tag work since there is a lien on the truck. Cole stated Fairway had already submitted the tag work and said he needed the insurance policy number as well as an additional \$966.20. See Ex. D, 6/21/18 email from Al Cole to John Kennedy.
12. On or about September 6, 2018, three months after the purchase of the 2018 vehicle, Al Cole with Fairway Ford emailed Kennedy and stated he was to sign where highlighted and take to DMV. On September 11, 2018, Kennedy emailed Cole with several questions concerning the status of the 2018 Ford F-250. See Ex. E September 11, 2018 email thread between John Kennedy and Al Cole.

13. On May 10, 2019, E. Brooks, a title clerk with Ford Credit, send a letter to Trinity concerning 2018 Ford pick-up truck. The letter stated that Ford Motor Credit Company had not received the Certificate of Title and Trinity was directed to contact the originating dealer as soon as possible so that the title may be obtained for the vehicle. In another letter on the same date Ford Credit informed Trinity that the Certificate of Title may have been sent to Trinity from the Department of Motor Vehicles and that the Certificate contained an error in that the lienholder's name should be Ford Motor Credit Company. See Ex. F, May 10, 2019 letter from Ford Credit to Trinity Electric and Controls.
14. On or about September 13, 2019, Al Cole, Commercial/Fleet manager for Fairway Ford, told John Kennedy a different story. Cole stated that Fairway Ford did not charge Trinity for the taxes and tag on the 2018 F250 because Kennedy told them he was going to do it. Cole stated that the trade-in was still in Fairway Ford's possession. He admitted Kennedy had signed the trade-in to Fairway Ford, but that Fairway could not pay it off until it was registered. Cole then stated that Fairway was handling the new plate registration and that it would be filed when Fairway can pay off the trade-in. See Ex. G, 9/13/19 email from Al Cole to John Kennedy.
15. On or about September 19, 2019, Al Cole sent John Kennedy an email stating, "If you will send me the paperwork back, we can do the tag work and you can reimburse us." See. Ex. H, 9/19/19 email from Al Cole to John Kennedy.
16. After receiving emails from David Charles, Commercial Vehicles Department Sales Manager for Fairway Ford that insinuated that the failure to register and pay the taxes on the vehicle was Mr. Kennedy's fault, Mr. Kennedy sent Mr. Charles an email response,

putting him on notice of the damages Trinity had suffered in this transaction. Fairway Ford did not respond and attempt to mitigate damages. See. Ex. I, 10/1/19 email thread between John Kennedy and David Charles.

17. Due to Fairway Ford's failure to register the F-250 pickup, Trinity was not able to use the truck in its business, despite paying Ford Credit \$1,100 a month for the truck.
18. Trinity never had full and free use of the F-250 pickup as contemplated when it purchased the truck.
19. In September 2019, Trinity purchased a 2019 F-150 pickup from Fairway Ford. During the purchase of this truck, which involved the trade-in of the 2018 F-250 pickup, it was revealed that Fairway Ford had not taken care of the registration and payment of the taxes for the 2018 vehicle.
20. Further, the same problem with payment of the taxes and registration has occurred with the 2019 vehicle. At present, the 2019 vehicle is in Trinity's possession, but Trinity is unable to drive it due to it being unregistered.
21. At present Trinity claims over \$75,000 in actual and consequential damages, due to Fairway Ford's breach of contract.

**For a First Cause of Action
Breach of Contract**

22. Plaintiff realleges the foregoing paragraphs as if fully restated herein.
23. Plaintiff entered into a contract in June 2018 for the purchase of a 2018 F-250 Ford pick-up. Plaintiff also entered into a contract in September 2019 in which the 2018 vehicle would be traded in for a 2019 F-150 pick-up.

24. Defendant breached the contracts in failing to pay the registration and taxes on the vehicle despite Plaintiff's payment for these services.
25. In so doing, Defendant's breach has caused additional expense and loss of work due to the fact it did not have use of the vehicles.
26. Plaintiff is entitled to actual and consequential damages.

WHEREFORE: Trinity prays for the following relief:

1. Actual damages,
2. Consequential damages, and
3. For such other and further relief as the Court may deem just and proper.

Respectfully submitted.

V. ELIZABETH WRIGHT LAW FIRM, LLC

s/V. Elizabeth Wright
V. Elizabeth Wright (S.C. ID 76029)
217 E. Park Avenue
Greenville, SC 29601
(864) 326-5281
bethwrightattorney@gmail.com

July 27, 2020

Greenville, South Carolina

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Complaint Ex. A Preview Order



Preview Order A222 - W2B 4x4 Crew Cab SRW: Order Summary Time of Preview: 03/14/2018 13:27:55

Dealership Name: Fairway Ford Lincoln

Sales Code: F21226

Dealer Rep.	a-cole17	Type	Retail	Vehicle Line	Superduty	Order Code	A222
Customer Name	J TRINITY	Priority Code	11	Model Year	2018	Price Level	835

DESCRIPTION	MSRP	DESCRIPTION	MSRP
F250 4X4 CREW CAB PICKUP/176	\$51365	ALL WEATHER FLOOR MATS	\$135
176 INCH WHEELBASE	\$0	6" CHROME TUBULAR STEP BAR	\$695
RUBY RED METALLIC	\$395	10000# GVWR PACKAGE	\$0
LEATHER 40/CONSOLE/40 SEAT	\$0	50 STATE EMISSIONS	\$0
CAMEL	\$0	BLIS (BLIND SPOT INFO SYSTEM)	\$540
PREFERRED EQUIPMENT PKG.608A	\$0	JACK	\$0
.LARIAT TRIM	\$0	EXTRA HEAVY DUTY ALTERNATOR	\$0
.TRAILER TOWING PACKAGE	\$0	TOUGH BED SPRAY IN BEDLINER	\$540
.SONY BRANDED PREMIUM AUDIO	\$0	LARIAT VALUE PACKAGE	\$710
.MACHINED CAST ALUM WHLS-18"	\$0	.LED BOX LIGHTING	\$0
.REVERSE VEHICLE AID SENSOR	\$0	.REMOTE START SYSTEM	\$0
.6.2L EFI V-8 ENGINE	\$0	.10-WAY POWER DRVR/PSS W/MEMORY	\$0
6 SPEED AUTOMATIC TRANS G	\$0	.HEATED/COOLED FRONT SEATS	\$0
.LT275/65R18E BSW ALL SEASON	\$0	FUEL CHARGE	\$0
3.73 ELECTRONIC LOCKING AXLE	\$390	PRICED DORA	\$0
JOB #1 ORDER	\$0	DESTINATION & DELIVERY	\$1295

TOTAL BASE AND OPTIONS

MSRP

DISCOUNTS

\$56065

TOTAL

NA

SHIP TO : F21226

\$56065

2323 Laurens Road, Greenville, SC, 29607-3295

\$51500

Customer Name:

Customer Email:

Customer Address:

Customer Phone:

Customer Signature

Date

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Complaint Ex. B Retail Buyers Order

FAIRWAY

LINCOLN



SUBARU

2323 LAURENS ROAD • GREENVILLE, SC 29607 • 864.242.5060

RETAIL BUYERS ORDER

Salesperson COLE, HERMAN AStock No. S741Em No. 4162DEAL NO. 1048676PURCHASER: TRINITY ELECTRIC AND CONTROLS INCDATE: 06/06/2018PHYSICAL ADDRESS: 3092 WILLOW RD / PO BOX 272

MAILING ADDRESS:

CITY: HENDERSONVILLESTATE: NC ZIP: 28739-0272COUNTY: HENDERSON

STATE: ZIP:

RESIDENCE PHONE: (828)654-8700BUSINESS PHONE: (828)654-8700

CELL PHONE:

FA
KE

VEHICLE PURCHASING

YEAR MAKE MODEL BODY STYLE

COLOR

VIN

MILEAGE

2018FORD F250 LARIA PURUBY RED1FT7W2861JEC5229025

VEHICLE TRADING IN

TAG#

VALIDATION#

YEAR MAKE MODEL BODY STYLE

AB

VIN

MILEAGE

2017FORD F150 XLT PU1FTFW1EG3HFC1124030130

INSURANCE AGENT

INSURANCE COMPANY

NAME	<u>MATT GAMBRELL</u>	NAME	<u>STATEFARM</u>
NUMBER & STREET		POLICY NUMBER	
CITY, STATE, ZIP CODE	<u>HENDERSONVILLE NC 28739</u>	EFFECTIVE DATES	
TELEPHONE NUMBER		FROM	TO
SPOKE TO	<u>MATT GAMBRELL</u>	DEDUCTIBLE	COLLISION

SELLING PRICE

52950.00

DEALER INSTALLED EQUIP.

TOTAL PRICE

52950.00

TRADE ALLOWANCE

27500.00

DIFFERENCE

25450.00

CLOSING FEE

225.00

SECURE ETCH

N/A

S.C. SALES TAX

N/A

LICENSE AND TITLE

20.00☐ NEW ☐ TRANSFER

EVR

N/A

TOTAL

25695.00

TRADE PAY-OFF

39917.06

TOTAL

65612.06

REBATE

1500.00

REBATE

N/A

REBATE

N/A

REBATE

N/A

REBATE

N/A

RECT. NO.

N/A

RECT. NO.

64112.06

SERVICE AGREEMENT

NET DUE

PAY-OFF INFORMATION

COMPANY: FORD MOTOR CREDIT CO

ACCOUNT NUMBER:

ADDRESS:

CITY:

STATE:

ZIP:

PHONE:

SPOKE TO:

AMOUNT:

39917.06

GOOD TIL:

FAIRWAY CHECK NO. & DATE:

Any monies owed due to a payoff discrepancy is the sole responsibility of the buyer. This order constitutes the entire agreement affecting this cash sale transaction and no other agreement or understanding of any nature concerning same has been made or entered into, or will be recognized. Should financing be requested, it is understood that no contractual relationship is established and the transaction will not be consummated until credit has been approved, until all disclosures required by the Consumer Credit Protection Act have been made, and until dealer and the customer have signed an installment sales contract. Upon finance company refusal, all deposits will be refunded. Customer buying outside insurance guarantees payment of insurance and holds harmless the dealership upon failure of the insurance company.

FORD MOTOR CREDIT

LIEN INFORMATION

PO BOX 105704ATLANTA GA 30348-5704

ADDRESS

06/06/2018

Purchaser's Signature

Date

Accepted By

Sales Manager

Purchaser's Signature

Date

Business Manager

WHITE - OFFICE

YELLOW - OFFICE

PINK - SALES

GOLDENROD - CUSTOMER

ELECTRONICALLY FILED - 2020 JUL 28 3:37 PM - GREENVILLE - COMMON PLEAS - CASE#2020CP2303555

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Complaint Ex. C – tax and fee summary

Tax / Fee Summary

1078101

VIN: 1FT7W2B61JEC52290

ACCOUNT #: 1078101	VIN: 1FT7W2B61JEC52290	DATE: 06/15/2018
BUYER: TRINITY ELECTRIC AND CONTROLS INC	CONTROL #: N/A	STOCK #: N/A
CITY/STATE: Hendersonville, NC	COUNTY: Henderson	DEALER STATE: SC
TYPE: Registration and Title w/ Trade-In	TRANS: Purchase (driving off lot)	PLATE: New
YEAR: 2018	MAKE: Ford	MODEL: Super Duty F-250 SRW

Breakdown of Registration/Title Fees

Registration Fee	
Title Fee	
Total Fees Due	\$134.00
	\$52.00
	\$186.00

Breakdown of Applicable Taxes

3% NC Highway Use Tax (Required for Titling and/or Registration)	
Total Taxes Due	\$770.25
	\$770.25

Additional Transactional Costs

e-Vendor transactional cost	
Total Transactional Costs Due	\$9.95
	\$9.95

Additional Fees

The State of North Carolina does not impose any penalty for Title/Registration purposes.	
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Disclaimer: Interstate Title Solutions, Inc. ("Service") takes reasonable measures to ensure that the data and information provided on/by its website is accurate. The data and/or information that is provided by the Service is "As Available" and all warranties, express or implied are disclaimed. The data and information provided relies on third party and/or state government data, the integrity and timeliness of which is not within the Service's control. In addition, the Service shall not be held liable for any data or information errors or omissions that are a result of information entered or provided by the user. Due to the time sensitivity of the data and/or information the Service will consider a calculation invalid at 31 days, or until such time as a late fee and/or interest accrual schedule begins for the applicable jurisdiction, at which time recalculation may be required. Pursuant to the terms and conditions of membership, all calculations/transactions will expire and become null and void at 91 days from account creation date.

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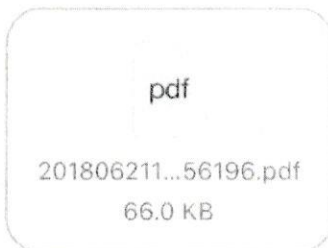
Complaint Ex. D – June 21, 2018 email Al Cole to John Kennedy

From: Al Cole al.cole@fairwayford.com
Subject: Tag work
Date: Jun 21, 2018 at 2:44:10 PM
To: John Kennedy tchnc@icloud.com, Kati McManaway
kati.mcmanaway@fairwayford.com

John, we are required to do the tag work since there is a lien on the truck. We have already submitted it and they need your insurance policy number.

Not to mention we need \$966.20

Al Cole
Fairway Ford Lincoln
Commercial/Fleet Manager
[864.752.6660](tel:864.752.6660)
www.fairwayford.com



Trinity Electric and Controls v. Fairway Ford, Inc. 2020-CP-23-_____

Complaint Ex. E – September 11, 2018 email Al Cole to John Kennedy

From: John john@trinityelectricind.com
Subject: Fwd: FedEx tracker
Date: Sep 11, 2019 at 2:21:51 PM
To: John Michael tchnc@icloud.com

Thanks

John

Trinity Electric & Controls

828-654-8700

Begin forwarded message:

From: John <john@trinityelectricind.com>
Date: September 11, 2019 at 1:18:50 PM EDT
To: Al Cole <al.cole@fairwayford.com>
Cc: Gavin Hutchinson <gavin.hutchinson@fairwayford.com>, Laurie Bowie <laurie.bowie@fairwayford.com>, Christi Putman <christi.putman@fairwayford.com>
Subject: Re: FedEx tracker

Please email me back the following information with any supporting documentation.

- 1) exactly what circumstances require me to do what you're asking with this title to the 2018 Ford F-250 vin # 1FT7W2B61JEC52290?
- 2) what laws have been broken or potentially could be broken that requires me to register the Ford F-250 vin # 1FT7W2B61JEC52290 in North Carolina? Chapter, article and section?
- 3) please send me a copy of the FedEx receipt that shows the original title to the 2018 Ford F-250 vin# 1FT7W2B61JEC52290 was signed for a year ago.
- 4) what is your current position On paying off the loan on the 2018 Ford F-250 vin# 1FT7W2B61JEC52290 that was traded in on 8-31-2019?
- 5) what is the current status of registering the 2019 F150 vin#

1FTFW1E45KFC76068 that was purchased on 8-31-2019?

6) who is the current owner of the 2018 F250 vin# 1FT7W2B61JEC52290?

7) Who is currently in possession of the 2018 Ford F250
vin# 1FT7W2B61JEC52290?

8) Who is the current owner of the 2019 Ford F-150
vin# 1FT7W2B61JEC52290?

9) What is the status on obtaining proper registration for the 2019 Ford F150
vin# **1FT7W2B61JEC52290?**

Thanks

John

Trinity Electric & Controls

828-654-8700

On Sep 6, 2019, at 2:12 PM, Al Cole <al.cole@fairwayford.com> wrote:

John, just sign where highlighted and take to DMV

Al Cole

Fairway Ford Inc

Fleet/Commercial Manager

864-242-5060 Ex 660

<20190906140810662.pdf>

Trinity Electric and Controls v. Fairway Ford, Inc. 2020-CP-23-_____

Complaint Ex. F – May 10, 2019 letters from Ford Credit letter to Trinity Electric and Controls



| FORD CREDIT

5/10/2019

TRINITY ELECTRIC AND CONTROLS
3092 WILLOW RD PO BOX 272
HENDERSONVILLE NC 28739

Re: Year/Make: 2018 FORD
Account No: 56475822

Dear TRINITY ELECTRIC AND CONTROLS:

We have not received the Certificate of Title for the vehicle that you financed through Ford Motor Credit Company. It is very important that we receive a title for your vehicle so that we may fully service your account. Without a title, the vehicle cannot be registered, traded, sold, or refinanced.

Please contact your originating dealer as soon as possible so that the title may be obtained for your vehicle.

If you received the title in error, please send the title to us at the address below so that we can ensure that the title and lien information is correct.

P.O. Box 105704
Atlanta GA, 30348-5704

Please feel free to call us with any questions at 1-877-224-1262.

E. Brooks
Sincerely,

E.BROOKS
Title Clerk



FORD CREDIT

May 10, 2019

TRINITY ELECTRIC AND CONTROLS
3092 WILLOW RD / PO BOX 272
HENDERSONVILLE NC 28739

Re: Our Account No.: 56475822
VIN: 1FT7W2B61JEC52290
Year/Make: 2018 FORD

Dear TRINITY ELECTRIC AND CONTROLS:

It has come to our attention that the Department of Motor Vehicles may have sent you the Certificate of Title for the vehicle described above. The recently issued title contains an error or errors. The items checked below are incorrect:

- ☐ Vehicle ID should be:
- ☐ Owner's name should be:
- ☒ Lien holder's name should be: FORD MOTOR CREDIT COMPANY
- ☐ Vehicle Year should be:
- ☐ Vehicle Make and Model should be:

In order to have the appropriate corrections made, the Department of Motor Vehicles requires the original title. If you are in possession of this title, please forward the title to my attention in the enclosed self-addressed, postage-paid envelope.

Thank you in advance for your prompt attention to this matter. If you have any questions, please contact our office at 1-877-224-1262.

Sincerely,

Account Services Department

Enclosure

Trinity Electric and Controls v. Fairway Ford, Inc. 2020-CP-23-_____

Complaint Ex. G – September 13, 2019 email from Al Cole to John Kennedy

From: Al Cole al.cole@fairwayford.com
Subject: Trucks
Date: Sep 13, 2019 at 1:12:00 PM
To: john john@trinityelectricind.com

John,

This is the information we have. On the 2018 F250, we did not charge you tax and tag, because you were going to do it. I tried to pull the UPS Tracking #, but they are only good for 120 days. Your trade in is still where I parked it. You signed it over to us, but we cant pay it off until its registered. The new plate registration (which we are doing) will be filed when we can pay off the trade in. Call me anytime.

Al Cole
Fairway Ford Inc
Fleet/Commercial Manager
864-242-5060 Ex 660



Trinity Electric and Controls v. Fairway Ford, Inc. 2020-CP-23-_____

Complaint Ex. H – September 13, 2019 email from Al Cole to John Kennedy

From: Al Cole al.cole@fairwayford.com
Subject: F250
Date: Sep 19, 2019 at 11:39:01 AM
To: john john@trinityelectricind.com

If you will send me the paperwork back, we can do the tagwork and you can reimburse us.

Al Cole
Fairway Ford Inc
Fleet/Commercial Manager
864-242-5060 Ex 660

Trinity Electric and Controls v. Fairway Ford, Inc. 2020-CP-23-_____

Complaint Ex. I – October 1, 2019 email thread from David Charles to John Kennedy

From: John john@trinityelectricind.com
Subject: Re: ****URGENT**** RE:Title Registration Issue Resolution
Date: Oct 1, 2019 at 4:38:05 PM
To: David Charles david.charles@fairwayford.com

David

I am working, on a job, out of state, and don't have time for this. All of these issues should have been handled TWICE in the past year.

What I currently know is as follows:

- * each time I have dealt with fairway ford and was assured everything was good to go, there is another hoop to jump through.
- *Ford credit says I am 8 days past due on the 2018 Ford F-250 payment.
- *Ford Credit says that late payment will start to affect my credit.
- *Ford credit says my payment is due on the 2019 Ford F-150 November 1.
- *In order to protect additional damages to my credit and my company's credit rating I will be paying on two loans, on two vehicles who's ownership is has never been clear.
- *I was never able to use the 2018 F-250 at will and on all the jobs I wanted. This cost me a significant amount of money.
- *The 2019 F-150 is supposed to be on a job tomorrow morning at 5:30 and I received a call that that temporary tag has expired and no permanent plate, that I paid for, has been issued or received. Again this will cost me a significant amount of money.

It should be very clear at this point that this entire mess needs to go to the next level.

I'll have our attorneys contact you or your counsel and hopefully this can be straightened out in a timely manner.

Thanks

John

Trinity Electric & Controls

828-654-8700

On Oct 1, 2019, at 11:34 AM, David Charles <david.charles@fairwayford.com>

wrote:

John,

Good morning.

Please read below.

We(you and I) need to bring this matter to a conclusion ASAP.

I did receive your returned Registration Paperwork, but none of it was signed. Also, we need proof of insurance for the trade-in vehicle in order to complete its registration process.

We can arrange to bring back your trade-in and pick-up the new truck if that is what you want. BUT< I hope as a valued customer you would want to complete this deal.

Thank you,

David "DC" Charles
Commercial Vehicles Department Sales Manager
Fairway Ford
2323 Laurens Road
Greenville, SC 29607
864-242-4395-Commercial Dept. Number
864-242-5060 ext. 580
843-412-7694(cell)
www.fairwayford.com

From: David Charles
Sent: Friday, September 27, 2019 1:55 PM
To: john@trinityelectricind.com
Subject: Title Registration Issue Resolution

John,

I hope you are well and are heading into a great weekend!

I did some more digging and I believe I have a resolution to this issue(finally!).

Our records do show the title work being sent to you last year.

Here is the shipping info for the title work sent you last year:

Tracking Number: 1ZA2367R0392742508, Service: UPS Ground Service, Guaranteed By: End of Day Thursday, Nov 1, 2018, Shipped To: Trinity Electric at address 3092 Willow Road Hendersonville, NC 28739.

We can register the trade here through our third party vendor, but we will need proof of insurance on the vehicle from you. Please send this proof asap.

Also, as it has never been registered, taxes and fees need to be paid. These come out to over \$1,000.00 once you include the late charges, but since we recognize you as a good customer that has tried to work through this issue, we will cover the fees, minus the NC Sales Tax amount of \$770.25. Please call me with your credit or debit card number so that we can be reimbursed for this amount.

As soon as you can provide me with the proof of insurance and credit/debit card we can put this issue behind us!

Thank you,

David "DC" Charles
Commercial Vehicles Department Sales Manager
Fairway Ford
2323 Laurens Road
Greenville, SC 29607
864-242-4395-Commercial Dept. Number
864-242-5060 ext. 580
843-412-7694(cell)
www.fairwayford.com